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*Attorneys for Defendant Renato Libric*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MOOSE RUN, LLC,

CASE NO.: 2:18-cv-00425-GMN-NJK

Plaintiff,

VS.

**MOTION AND [PROPOSED] ORDER  
TO WITHDRAW AS COUNSEL OF  
RECORD**

RENATO LIBRIC, individually; and DOES 1-10,

### Defendants.

Leslie Bryan Hart and Brandi M. Planet respectfully move this Court for an order permitting Leslie Bryan Hart, Esq. and Brandi M. Planet, who have appeared in these proceedings, and the law firm Fennemore Craig, P.C. to withdraw as local counsel for Defendant Renato Libric in the above captioned matter pursuant to Local Rule IA 10-6.

This Motion is made and based upon the following Memorandum of Point and Authorities, the Declaration of Leslie Bryan Hart (“Hart Decl.”) attached hereto as **Exhibit A**, the pleadings and papers on file herein, and oral argument, if any, requested by the Court.

DATED: June 4, 2018.

## **FENNEMORE CRAIG, P.C.**

By: /s/ Leslie Bryan Hart  
Leslie Bryan Hart, Esq. (SBN 4932)  
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*Attorneys for Defendant Renato Libric*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

Local Rule IA 10-6 (b) provides, "No attorney may withdraw after appearing in a case except by leave of court after notice served on the affected client and opposing counsel." Additionally, Local Rule IA 10-6 (e) provides, "[N]o withdrawal or substitution shall be approved if delay of discovery, the trial or any hearing in the case would result."

Ms. Hart has provided notice to Renato Libric's lead counsel, George E. Kostel, Esq. and Jason Matechak at Impresa Legal Group (who had previously intended to seek permission to appear in this case pro hac vice), of her intent to withdraw on or about May 16, 2018. *See Exhibit A*, Hart Declaration, at ¶ 3. Such notice was given after Libric not only failed to fulfill the obligations of the engagement agreement he entered with Fennemore Craig, P.C., but also upon Ms. Hart being advised by lead counsel on May 10, 2018, that Mr. Libric was taken into custody and is currently being held in the San Mateo County Jail in California. Ms. Hart has not had any direct communication with Mr. Libric, and such is not possible at this time for the reason set forth above, although a copy of this Motion will be emailed to Mr. Libric at the email address he previously provided.

Opposing counsel in this case will receive notice of this Motion to Withdraw via the CM/ECF system, pursuant to the certificate of service below.

Withdrawal of Ms. Hart and Ms. Planet and the law firm Fennemore Craig, P.C. will not result in delay of discovery, trial, or any hearings as Mr. Libric has now appeared through new Nevada counsel.

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## **CONCLUSION**

For the reasons set forth above, Ms. Hart, Ms. Planet and the law firm Fennemore Craig, P.C. move this Court to enter an order approving their withdrawal as representing attorneys for Renato Libric in the instant matter.

DATED: June 4, 2018.

FENNEMORE CRAIG, P.C.

By: /s/ Leslie Bryan Hart  
Leslie Bryan Hart, Esq. (SBN 4932)  
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*Attorneys for Defendant Renato Libric*

## ORDER

IT IS SO ORDERED.

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**UNITED STATES MAGISTRATE JUDGE**

DATED: June 5, 2018